



Liberty Utilities (CalPeco Electric) LLC
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June 3, 2022

DATA REQUEST RESPONSE

LIBERTY UTILITIES (CALPECO ELECTRIC) LLC 2022 WMP

Data Request No.: CalAdvocates-Liberty-2022WMP-07
Subject Matter: 2022 Wildfire Mitigation Plan
Originator: Aaron Louie
Due Date: June 3, 2022

REQUEST NO. 1:

On page (p.) 125 of Liberty's 2022 WMP, Liberty states "Liberty collects customer satisfaction information from J.D. Power surveys and uses the data to select initiatives to improve customer service. Over the last few years, Liberty has instituted several measures to improve customer service, communications, and operations."

Please identify each specific measure (referenced in the quote above) that Liberty has implemented since 2020 "to improve customer service, communications, and operations."

RESPONSE TO REQUEST NO. 1:

Page 126 of Liberty's 2022 WMP provides a summary of measures implemented to improve customer service. Copies of specific measures are attached to this response and include:

- Tahoe City 7300 covered conductor project – VM department initiated a direct mail campaign to property owners explain vegetation management work and WMP system hardening project relationship (January 2021)
- Wood Removal letter – informing impacted customers of new options offered for hauling wood removal after completing VM projects (Aug 2021 and October 2021)
- Pre-tree work postcard – being sent to customers in neighborhoods prior to planned tree work to let customers know in advance what to expect (created in 2021; began use in January 2022)
- Pre-inspection postcards to be sent to customers letting them know what to expect during vegetation inspections (created in 2021; ready to use as needed for pre-inspection notifications)
- New Pole Clearing Door hanger - used by pole clearing contractor when notifying and performing PRC 4292 inspections and maintenance

- New and updated door hanger for tree work to provide better information for the customer and easier communication between the customer, veg management, and/or contractor
- Monthly social media posting letting customers know where vegetation management work is scheduled for the month
- Wildfire Mitigation Brochure with large focus on vegetation management program
- Updated Liberty Vegetation Management website with new online form for submitting request for inspection by a Liberty arborist, provided information and link to CA Tahoe Conservancy for collaboration on firewood program, updated VM FAQ's sheet

REQUEST NO. 2:

On page 125 of Liberty's 2022 WMP, Liberty states:

To better manage community impacts, Liberty is working to shift the focus of this initiative from quantitative targets to qualitative outcomes. Quantitative metrics will be used to evaluate progress and establish a baseline for future evaluations. Liberty's near-term improvements are related to improving processes for capturing data in order to better define goals and set meaningful targets. Improving the quality of data used will improve the ability to manage for desired outcomes. Liberty continues to develop processes and procedures, including improving customer communications, developing a tree replacement program, and additional integrated vegetation management program development.

- a) Please explain why Liberty moved from quantitative targets to qualitative outcomes.
- b) Identify the quantitative metrics that "will be used to evaluate progress and establish a baseline for future evaluations."
- c) Describe the actions Liberty is taking in 2022 to improve processes for capturing data.
- d) Explain how improving the quality of data will "improve the ability to manage for desired outcomes."

RESPONSE TO REQUEST NO. 2:

The discussion on qualitative outcomes and quantitative metrics begins on Page 129 of Liberty's 2022 WMP.

- a) Liberty describes several efforts across a wide variety of disciplines being taken to manage community and environmental impacts when performing vegetation management. Within the various areas of focus, there are opportunities to collect data and measure progress. There is no single quantitative target that can currently be identified as a measure of overall program success. For this reason, Liberty determined a qualitative approach is more appropriate for this initiative.

- b) Liberty is still identifying specific metrics to best guide future goals, but we are currently focusing on data related to customer outreach efforts and establishing monitoring protocols to inventory compatible species where we manage vegetation.
- c) Liberty is developing processes within pre-existing tasks to incorporate data collection for this purpose, providing training to employees and contractors where needed to gather the data, creating a new framework for the data to be centralized and more readily available, and working with consultants to establish protocols so that the data is collected appropriately according to accepted practices within the scientific community.
- d) The absence of quality data would not provide an accurate representation of current conditions and could result in making management decisions that could lead to an undesirable outcome.

REQUEST NO. 3:

On page 130 of Liberty's 2022 WMP, Liberty states "The initial phase builds on information gained through the Biodiversity Exposure Assessment and develops a framework for implementing projects. Near-term IVM Program development goals include Conduct program assessment using the Vegetation Management Maturity Model."

- a) Has Liberty completed the Conduct program assessment, using the Vegetation Management Maturity Model?
- b) If the answer to part (a) above is no, when will Liberty complete the Conduct program assessment?

RESPONSE TO REQUEST NO. 3

- a) Yes
- b) Not applicable

REQUEST NO. 4:

On page 131 of Liberty's 2022 WMP, Liberty states "The detailed inspections are comprehensive, and arborists are instructed to inspect any problematic vegetation with the potential to impact utility assets."

- a) Are the arborists who perform this work contractors or Liberty employees?
- b) Are the arborists who perform this work certified by the International Society of Arboriculture (ISA)?

RESPONSE TO REQUEST NO. 4

- a) Contract arborists perform most vegetation inspections.

- b) Out of 12 contractors who performed vegetation inspections in 2021, 9 were ISA Certified Arborists. Minimum qualifications required for arborists to perform detailed inspections include:
- Minimum of one year experience in utility arboriculture
 - ISA Certified Arborist
 - Associates degree or greater in urban forestry, forestry, botany, ecology, biology, conservation, environmental science, horticulture or comparable area may substitute for work experience to fulfill the minimum qualifications for this position at the discretion of CalPeco's Vegetation Program Manager.

REQUEST NO. 5:

On page 133 of Liberty's 2022 WMP, Liberty provides Table 7.3.5-2: Total Vegetation Inspections Completed by Liberty in 2021.

WMP Initiative Category	WMP Initiative Number	WMP Initiative Activity	Unit of Measure	2021 Target Production	2021 Actual Production
Vegetation Management & Inspections	7.3.5.2	Detailed Inspections	Line Miles Inspected	207	178
Vegetation Management & Inspections	7.3.5.7	LiDAR Inspections	Line Miles Inspected	701 ²²	701
Vegetation Management & Inspections	7.3.5.11	Patrol Inspections	Line Miles Inspected	150	179
Vegetation Management & Inspections	7.3.5.13	Quality Control Inspections	Line Miles Inspected	136	156
Total Vegetation Inspections for 2021				1,194	1,214

- a) Please explain why Liberty was unable to complete its target of 207 miles for detailed inspections in 2021.
- b) Please explain why Liberty did not perform detailed inspections on all 701 line-miles in 2021.
- c) How does Liberty plan and schedule VM detailed inspections?
- d) Does Liberty plan to perform VM detailed inspections on each circuit-segment with a specific frequency (e.g., every three years)?
- e) Does Liberty plan each year to perform detailed inspections on a specific set of circuits or circuit-segments?

f) If the answer to part (e) above is yes, please provide the list of circuit-segments that were subject to detailed inspections in 2021, including the circuit name, circuit ID number, and circuit-segment ID number (corresponding to your responses to data request CalAdvocates-Liberty-2022WMP-03, questions 1 and 2).

g) If the answer to part (e) above is yes, please provide the list of circuit-segments that are planned for detailed inspections in 2022, including the circuit name, circuit ID number, and circuit-segment ID number (corresponding to your responses to data request CalAdvocates-Liberty-2022WMP-03, questions 1 and 2).

RESPONSE TO REQUEST NO. 5

- a) During emergency response to wildfires entering the service territory, Liberty moved inspectors from scheduled, detailed inspections to perform unscheduled, patrol where infrastructure was damaged or threatened by fire damaged trees.
- b) Liberty performed LiDAR inspections on all 701 miles for the primary purpose of identifying locations where vegetation management was required to maintain vegetation to conductor clearances. Due to that purpose being served by the remote sensing technology, detailed inspections were not planned for all 701 miles.
- c) Detailed inspections are planned and scheduled based on maintenance history so that their occurrence is regular and consistent. Liberty also has workforce in two geographic regions and the workload is planned to be balanced between regions.
- d) Liberty does not have a specific frequency by which all detailed inspections are scheduled for each circuit-segment.
- e) Yes, Liberty develops an annual plan for scheduling detailed inspections
- f)

Circuit ID	Circuit Section
Brockway 5100	1
Topaz 1261	2
Stampede 8700	1
Muller 1296	4
Squaw Valley 8200	1
Topaz 1261	3
Tahoe City 5201	3
Topaz 1261	1
650 Line	1
Meyers 3400	5
Tahoe City 7300	2
Tahoe City 7300	3
Tahoe City 7300	1
Meyers 3400	2
Meyers 3400	3

Tahoe City 7300	5
Meyers 3400	1
Tahoe City 7300	4
Tahoe City 7300	7
Tahoe City 7300	6

g)

Circuit ID	Circuit Section
625 Line	1
629 Line	1
California 204	1
Meyers 3100	1
Meyers 3100	2
Meyers 3100	3
Meyers 3100	4
Meyers 3200	1
Meyers 3200	2
Meyers 3200	3
Meyers 3200	4
Meyers 3300	1
Meyers 3300	2
Meyers 3300	3
Meyers 3300	4
Meyers 3300	5
Meyers 3400	1
Meyers 3400	2
Meyers 3400	3
Meyers 3400	5
Russell Valley 7900	1
Tahoe City 7200	1
Tahoe City 7300	5
Tahoe City 7300	6
Tahoe City 7300	7
Truckee 7202	1
Truckee 7202	2

REQUEST NO. 7:

- a) Please state the number of corrective VM actions that Liberty identified in 2021.
- b) How many total VM Quality Control inspections did Liberty perform in 2021?
- c) Of the VM Quality Control inspections that Liberty performed in 2021, how many identified no problems?
- d) Please state the number of VM Quality Control inspections in 2021 that resulted in a corrective VM action.
- e) In instances where VM Quality Control inspections produced corrective VM actions, please identify the top 5 leading causes that contributed to the corrective VM actions and state how many corrective VM actions each one contributed to.

RESPONSE TO REQUEST NO. 7

- a) Liberty is unclear what corrective VM actions this question refers to or how corrective action is defined in this context.
- b) Liberty provided detailed information about the quantity of Quality Control Inspections completed in Section 7.3.5.13 of the 2022 WMP Update. Liberty is unclear what additional information is requested.
- c) Liberty is unclear what unit of measure is referenced in this request. Additionally, Quality Control inspections follow a specific set of questions and criteria by which work is evaluated and the term “no problems” is overly broad and vague.
- d) Liberty is unclear what criteria is being used to determine if a condition constitutes a corrective action in this request.
- e) Liberty is unclear what criteria is being used to determine if a condition constitutes a corrective action in this request.

REQUEST NO. 8:

On page 135 of Liberty’s 2022 WMP, Liberty states “In spring of 2021, the Vegetation Management team conducted an analysis to establish priorities for Fuel Reduction Projects to complete by end of 2021.”

- a) Does Liberty plan to conduct a similar assessment annually?
- b) If the answer to part (a) is yes, in what month or quarter of the year does Liberty plan on conducting these assessments?

RESPONSE TO REQUEST NO. 8

- a) Yes, Liberty will analyze and prioritize fuel reduction projects as needed.
- b) There is not a an established schedule for when assessments are to be performed.

REQUEST NO. 9:

On page 136 of Liberty's 2022 WMP, Liberty states:

Liberty has completed various projects focused on fuel management and reduction of slash. These projects included community fuel treatments, collaboration with large landowners and agency partners, substation defensible space, and wood recycling efforts. Liberty completed 16 fuel management projects in 2021 throughout its territory.

How many fuel management projects does Liberty plan to complete in 2022?

RESPONSE TO REQUEST NO. 9

Liberty is projecting to complete fuel management and reduction of slash on 280 acres. The exact number of projects that the comprises the acreage is not specified, because it can fluctuate based on unknown needs or opportunities that may arise.

REQUEST NO. 10:

On page 141 of Liberty's 2022 WMP, Liberty states, "In 2020, Liberty performed a comprehensive review of its VM program to identify areas of improvement and began updating its processes and procedures to meet program objectives."

a) What are the top five areas of improvement identified by Liberty from this comprehensive review?

b) For each of the five areas of improvement identified in part (a), please list:

- i. The specific actions that Liberty identified to improve performance,
- ii. The planned timeframe for each action, and
- iii. The current status of each action.

c) What is the current status of Liberty's effort to "update[e] its processes and procedures to meet program objectives"? When does Liberty expect to complete this effort?

RESPONSE TO REQUEST NO. 10

- a) A concern about the number of trees that were found to be encroaching into the mandated clearance zone or otherwise not completed in accordance with regulatory requirements was the main area of improvement identified. Three contributing factors were identified as areas for improvement, and five recommendations were provided to make improvements (see 10b) for discussion of 5 recommendations).

Contributing Factors:

- Lack of a complete tree inventory
 - Completed work that does not comply with Liberty's specification
 - Tree work and Pole clearing work appeared to be inadequate
 - Inadequacy of a 3-year maintenance cycle
- b) Five recommendations were identified as areas for improvement:
- a) Liberty should continue to update and refine the tree inventory database (i.) during each inspection (ii). The complete inventory was completed in 2021 (iii.)
 - b) Liberty should ensure contractors are meeting the requirements set forth in the specification for clearances to be achieved (i) during the completion of VM work (ii). Liberty completed development of a QA/QC program in 2021 (iii).
 - c) Consideration should be given to implementing annual inspections for all distribution lines (i & ii). Liberty completed the first annual inspection for all lines in 2021 (iii).
 - d) Liberty may need to implement a more structured audit of the pole brushing contractor's work. This is part of the QA/QC program implemented in 2021.
 - e) Liberty should transition to a modified clearance regiment (i) over the next two years (ii) based on the following recommended clearances. Liberty has fully implemented Phase I and is considering something similar to what is proposed in Phase II, but no timeline for implementing Phase II is currently planned.

Phase I – Implementation 2021

Voltage	Regulation Clearance Distance RCD	Trigger Clearance Distance TCD	Maintenance Clearance Distance - Minimum MCD
14.4kV	4'	6'	12' – 15'
60kV	4'	6'	12' – 15'
120kV	10'	15'	30'

Phase II – Implementation 2022-2023

Voltage	Regulation Clearance Distance RCD	Compliance Clearance Distance CCD	Trigger Clearance Distance TCD	Maintenance Clearance Distance - Minimum MCD
14.4kV	4'	6'	9'	12' – 15'
60kV	4'	6'	9'	12' – 15'
120kV	10'	15'	18'	30'

RCD – Clearance distance between conductors and vegetation that is mandated by regulations.

TCD – Clearance distance that triggers the work scheduling process. The TCD is based on the regulation clearance with a safety margin multiplier of 1.5. This identified work generally needs to be completed within the next year.

MCD – Clearance distance to be achieved at time of work. Minimum clearances based on Rule 35, Appendix 'E'. Clearance to be increased, as needed, based on vegetation growth rates.

- c) Various VM program documents have been developed or updated including the Vegetation Management Plan, the Hazard Tree Management Plan, the Post-Work Verification Procedure, and the Vegetation Threat Procedure. Program development, and in some cases modifications to existing procedures and plans, will continue indefinitely as part of Liberty's continuous improvement.

REQUEST NO. 11:

On page 141 of Liberty's 2022 WMP, Liberty notes that it "Piloted LiDAR technology as a new inspection protocol" in 2020.

- a) Does the cost per mile of LiDAR inspections vary depending on the application for which LiDAR is being used?
- b) What is the current cost per mile for LiDAR when used for VM inspections?

RESPONSE TO REQUEST NO. 11

- a) Yes.
- b) It varies.

REQUEST NO. 12:

On page 142 of Liberty's 2022 WMP, Liberty states "Third party assessments of Liberty's VM program were performed during that time to evaluate the workload and resource requirements and gather other information to make recommendations to improve program effectiveness."

- a) Does Liberty intend to continue the third-party assessments in the future or does Liberty eventually plan to conduct this type of assessment in-house?
- b) What "recommendations to improve program effectiveness" resulted from the third-party assessments referenced in the quote above?

RESPONSE TO REQUEST NO. 12

- a) To continually improve Liberty's vegetation management program, policies and procedures will be assessed as needed. Assessments may be provided by a third-party or conducted internally.
- b) Refer to Response 10.

REQUEST NO. 13:

On page 145 of Liberty's 2022 WMP, Liberty states:

Liberty is evaluating how remote sensing can be implemented to enhance how hazard trees capable of striking facilities are identified and mitigated. Liberty is piloting the use of imagery that has been collected along with the LiDAR to perform tree health analysis.... If successful, the data can be used to gain efficiencies with the identification, planning, inspection and removal of dead and dying trees that are potential hazards.

- a) How does Liberty intend to evaluate the effectiveness of using of imagery to perform tree health analysis?
- b) What is the scope of the pilot program mentioned in the quote above?
- c) What is the expected duration of the pilot program mentioned in the quote above?
- d) How many distribution circuit-miles does Liberty intend to perform the pilot program on?
- e) How many transmission circuit-miles does Liberty intend to perform the pilot program on?

RESPONSE TO REQUEST NO. 13

- a) Liberty will compare the outcomes of using remote sensing technology to past practices to determine if one method produces results that suggest increased effectiveness over the alternative.
- b) Liberty is using the data acquired in 2021 and the analytics to perform the deliverable is being conducted on a 300' wide corridor for all of the inspected areas.
- c) The duration is somewhat dependent on initial results but is likely to be evaluated for addressing continuous tree mortality through 2023.
- d) Due to the size of Liberty's territory, there is no significant cost savings to be realized by processing a fraction of the territory. Liberty intends to perform the pilot on all 701 miles of its system.
- e) See 13d) The 701 miles includes all voltages.

REQUEST NO. 14:

On page 146 of Liberty's 2022 WMP, Liberty states "Due to the nature of increasing tree mortality within its service territory, Liberty has identified the need to implement accelerated inspections for dead and dying trees along its system."

- a) Does Liberty conduct an annual patrol of 100% of its overhead system for vegetation hazards?
- b) During which months or quarters of the year does Liberty perform its patrols for vegetation hazards?
- c) Does Liberty plan to complete its annual patrols for vegetation hazards prior to the peak fire season?

RESPONSE TO REQUEST NO. 14

- a) Liberty does not conduct patrol inspections (as defined in 7.3.5.11 of the WMP) of 100% of its overhead system.
- b) Patrol inspections are conducted during all months of the year.
- c) See 14b)

REQUEST NO. 15:

On page 147 of Liberty's 2022 WMP, Liberty states that one of the purposes of Tree Pruning and Removal QC Inspections is to "Ensure the Maintenance Clearance Distance (MCD) was achieved or work was completed as otherwise described in the work prescription."

- a) How many trees were found to have not met the MCD during the Quality Control inspections in 2020?
- b) How many trees were found to have not met the MCD during the Quality Control inspections in 2021?
- c) How many Tree Pruning and Removal QC Inspections did Liberty complete in 2021?
- d) How many circuit miles did Liberty inspect with Tree Pruning and Removal QC Inspections in 2021?
- e) How many Tree Pruning and Removal QC Inspections does Liberty plan to complete during 2022?
- f) How many circuit miles does Liberty intend to inspect with Tree Pruning and Removal QC Inspections during 2022?

RESPONSE TO REQUEST NO. 15

- a) Zero
- b) 374
- c) 5,053
- d) 156
- e) Target is based on miles, of which Liberty plans to complete 221.

REQUEST NO. 16:

On page 150 of Liberty's 2022 WMP, Liberty states:

Liberty recognized that the volume of work would outpace the ability to successfully manage its implementation, and an assessment of the VM organization was initiated to determine an appropriate structure for program management. From the assessment, a staffing plan was developed to accommodate recent program growth.

- a) Did Liberty have a backlog of vegetation management work or training at the end of 2021?
- b) If the answer to part (a) is yes, what is the status of completing the backlogged work, as of May 25, 2022?
- c) Does Liberty currently have a backlog of VM work or training?

RESPONSE TO REQUEST NO. 16

- a) No
- b) Not applicable
- c) No

REQUEST NO. 17:

On page 151 of Liberty's 2022 WMP, Liberty states:

In August 2021, Liberty completed an assessment of the quantity and quality of internal personnel in relation to the ability to achieve VM program objectives... Insufficient VM workforce was identified as the biggest threat to program success. Liberty took appropriate action and identified the staffing levels necessary to maintain program effectiveness. Liberty is currently filling the additional positions and once fully staffed, the VM Department will have doubled in size since filing Liberty's 2020 Wildfire Mitigation Plan.

- a) What are the minimum number of full-time employees and their qualifications identified by the August 2021 assessment of internal VM staffing?
- b) When does Liberty expect to have a full VM staff, per the assessment from August 2021?

RESPONSE TO REQUEST NO. 17

- a) Liberty requested to bring the internal staffing level from 5 to 8 full time employees, but also recognized the potential need for additional positions to support the continued growth and development of the program in response to regulatory requirements.
- b) Liberty expects to have all positions filled before filing its 2023 WMP. Currently one position is vacant.

REQUEST NO. 18:

On page 152 of Liberty's 2022 WMP, Liberty states, "Identification of at-risk species are typically performed by completing a Level 1: Limited Visual Assessment per ANSI A300 (Part 9) Tree Risk Assessment and in accordance with Liberty's Hazard Tree Management Plan."

At what frequency does Liberty conduct inspections to identify At Risk Species?

RESPONSE TO REQUEST NO. 18

- a) Inspections to identify At Risk Species occurs as part of daily program operations throughout the year.

REQUEST NO. 19:

On page 154 of Liberty's 2022 WMP, Liberty states that hazardous tree mitigation actions include "Monitoring: Assessed trees may be monitored when they are considered stable and are not expected to pose a risk to electric facilities in the foreseeable future but show signs of emerging hazard tree attributes or changing site considerations."

- a) In 2021 how many trees were being monitored by Liberty?
- b) As of the issuance of this data request, how many trees is Liberty currently monitoring?
- c) Are monitored trees prioritized for enhanced attention or inspections in the following year?

RESPONSE TO REQUEST NO. 19

There are several trees in Liberty's database that do not have current workers but are included in the inventory of trees with previous or future maintenance needs. Liberty conducted an inventory of its system to determine the total number of trees capable of impacting facilities based on their proximity and height. This inventory shows nearly 260,000 trees that can strike a conductor and a total of approximately 700,000 trees in the inventory.

REQUEST NO. 20:

On page 154 of Liberty's 2022 WMP, Liberty states "Tree and limb failures are common throughout the Liberty service territory."

- a) In 2020, how many tree or limb failures resulted in contact with Liberty's electric facilities?
- b) In 2021, how many tree or limb failures resulted in contact with Liberty's electric facilities?
- c) Does Liberty perform any root cause analysis (including considering how to better identify hazard trees) when a tree or limb failure results in contact with an electric conductor?

RESPONSE TO REQUEST NO. 20

- a) Liberty only tracks the tree or limb contacts that result in a forced outage. In 2020, there were 19 tree-related forced outages.
- b) Liberty only tracks the tree or limb contacts that result in a forced outage. In 2021, there were 41 tree-related forced outages.
- c) Liberty developed a process for collecting and storing data from vegetation related outages to build a database for performing root cause analysis. Each time an outage is identified as being tree caused, an arborist will complete an outage investigation and enter the data into the database. If there appears to be a trend, Liberty will perform additional root cause analysis to determine the need for adjusting work scope, specifications, schedules, or priorities depending on the findings and results of the analysis.

REQUEST NO. 21:

On page 158 of Liberty's 2022 WMP, Liberty states, "Liberty's VM group plans to continue discussing improvements in tracking overall circuit work. Liberty has implemented additional software and data collection systems to manage and track project specific tree inventories as the program has evolved."

- a) What are the improvements in tracking overall circuit work that are currently under discussion?
- b) Please describe in detail the additional software and data collection systems being implemented to manage and track tree inventories.

RESPONSE TO REQUEST NO. 21

- a) Liberty has outgrown processes previously in place for program management and updated structure is needed to manage the processes and procedures provided in 10c) as well as the daily workflow and business processes. This is being accomplished by drawing from the Project Management Body of Knowledge to establish traditional project management principles for the program.
- b) Liberty has been undergoing several enterprise wide software updates that are being incorporated into program administration, contract management, and procurement related activities. Additional software being evaluated is intended to provide integration of data collection and work management software from field operations and business process management applications to drive continuous improvement, project tracking and reporting capabilities, and additional efficiencies to be realized through possible automation of previous processes.

June 3, 2022

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If you have any questions or require any additional information, please contact me at:

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Liberty Utilities (CalPeco Electric) LLC
701 National Ave,
Tahoe Vista, CA 96148
Telephone: 530-721-7818
jordan.parrillo@libertyutilities.com



January 6, 2021

Dear "Customer First and Last Name",

Happy New Year! As 2021 gets underway, Liberty is wasting no time getting started on one of our 2021 wildfire mitigation projects. This project will replace existing distribution power line, mostly along the Hwy 89 corridor in Tahoma, with covered power line to reduce the potential of fire ignitions and improve electric service reliability. To accomplish the line replacement, Liberty will also be replacing power poles as well as pruning and removing trees to ensure compliance with State mandates for fire protection and electrical safety.

Beginning this month, Liberty crews will be in the field conducting pre-construction surveys for this project. If tree removal or pruning is required on your property, you will be notified of what to expect.

Construction work is anticipated to begin in June 2021 and will last approximately 2 months. We will provide an update as the construction window nears. This project provides an opportunity for community enhancement and increased fire resiliency by hardening the electric infrastructure and properly maintaining vegetation along the electric right-of-way in alignment with best management practices. Examples of this new fire-protection utility system can be seen on SR 89 near Sugar Pine State Park.

Field crews will be practicing social-distancing during this time, so please respect their space. If you have any questions about this project please contact myself at 616-260-1961.

Sincerely,

A handwritten signature in black ink that reads 'Liz Lawton' in a cursive script.

Liz Lawton
Program Manager, Environmental



Wood Removal Notification

Dear customer:

Liberty is required to prune and remove trees to maintain clearance between vegetation and high voltage powerlines and to mitigate the risk of weakened or structurally defective trees falling into electrical infrastructure.

As part of our continued fuel management efforts, Liberty will be removing wood generated from vegetation management activities. Our records indicate vegetation management work was recently performed on your property. Liberty contractors will be returning in approximately four to six weeks to haul away wood that has been left on site from our vegetation management work.

Only wood and debris from our operations is eligible for wood removal. We may be unable to remove some or all of the wood due to access or equipment restrictions. Each site will be evaluated by the contractor, who will remove any wood if safe and reasonable to do so. If you wish to keep the wood, please contact the Liberty Vegetation Management Department and leave your name, address, and contact information.

Sincerely,

Liberty Vegetation Management Department
CATree@libertyutilities.com
530-546-1787
www.LibertyUtilities.com>Safety>Electric Safety>Tree Safety



PO Box 107
Tahoe Vista, CA 96148

Presorted Standard
US Postage
PAID
Mira Loma, CA
Permit No. 34

Dear Customer,

Liberty would like to inform you that vegetation maintenance work will begin in and around your neighborhood in the coming weeks. Liberty's professional arborists employ utility pruning and tree removal practices recommended by the International Society of Arboriculture, American National Standards Institute, and the Arbor Day Foundation. These practices guide us in maintaining a healthy community forest and keeping the electric right-of-way clear of hazards.

This is what you can expect:

- Tree crews will knock on your door before beginning work
- If no one is home we will leave a door hanger
- Tree crews will be pruning for power line clearance
- Tree crews will clean up debris

Field crews will be practicing social-distancing during this time, so please respect their space. If you have any questions about this project or our vegetation management practices please contact, CAtree@libertyutilities.com or visit <https://libertyutilities.com/cavegetation/>

Sincerely,

Vegetation Management Department





PO Box 107
Tahoe Vista, CA 96148

Presorted Standard
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Mira Loma, CA
Permit No. 34

Dear "Customer First and Last Name",

Liberty is committed to our community forest health while continually working to reduce wildfire risk through its ongoing Vegetation Management Program. As part of this program, Liberty's professional arborists and contractors will be performing inspection work in and around your neighborhood <insert date/month> for upcoming vegetation maintenance.

This is what you can expect:

- Xyz
- Xyz

Field crews will be practicing social-distancing during this time, so please respect their space. If you have any questions about this project or our vegetation management practices please contact, CAtree@libertyutilities.com or visit <https://libertyutilities.com/cavegetation/> .

Sincerely,

Vegetation Management Department



Pole Clearing

Liberty owns approximately 24,000 wood poles to support distribution and transmission power lines. These poles are located throughout the Liberty service territory on land that falls under the jurisdiction of the State of California or the federal government for fire protection services.

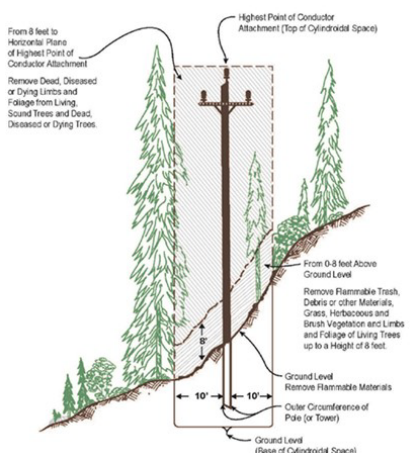
California Public Resources Code Section 4292 requires Liberty to remove flammable debris and vegetation near poles. Liberty and its contractors regularly perform pole clearing activities throughout its service territory in compliance with Section 4292.

Liberty follows these minimum clearances:

(a) At the ground line, a minimum of a 10-foot radius area, measured horizontally from the outer circumference of the pole, shall be consistent with a firebreak and be cleared by removing flammable materials, including but not limited to, ground litter and debris, duff, and dead or desiccated vegetation that could propagate fire.

(b) From the ground line to eight feet above the ground line, a minimum of a 10-foot radius area, measured horizontally from the outer circumference of the pole, shall be cleared by removing flammable materials including trees, herbaceous and brush vegetation, grass, trash, debris or other materials.

Limbs and foliage of living or dead trees that are smaller than four inches in diameter shall be removed up to a height of eight feet.





Despeje de Postes

Liberty tiene aproximadamente 24,000 postes de madera para soportar líneas de distribución y transmisión de energía. Estos postes están ubicados en todo el territorio de servicio de Liberty en terrenos que se encuentran bajo la jurisdicción del Estado de California o del gobierno federal para los servicios de protección contra incendios.

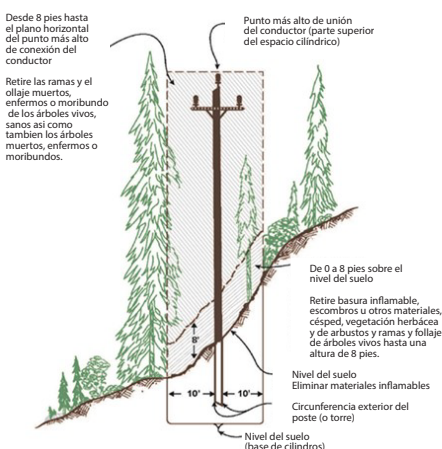
La Sección 4292 del Código de Recursos Públicos de California requiere que Liberty elimine los escombros inflamables y la vegetación cerca de los postes. Liberty y sus contratistas realizan regularmente actividades de limpieza de postes en todo su territorio de servicio de conformidad con la Sección 4292.

Liberty sigue estas Regulaciones:

(a) Del suelo, un mínimo de un área de radio de 10 pies, medido horizontalmente desde la circunferencia exterior del poste, deberá ser consistente con un cortafuegos y se limpiará mediante la eliminación de materiales inflamables, incluidos, entre otros, la basura del suelo y escombros, maleza y vegetación muerta o desecada que podría propagar el fuego.

(b) Del suelo hasta dos metros y medio hacia arriba del suelo, se despejará un mínimo de un área de radio de 10 pies, medida horizontalmente desde la circunferencia exterior del poste, mediante la eliminación de materiales inflamables, incluidos árboles, vegetación herbácea y arbustiva, césped, basura, escombros u otros materiales.

Las ramas y el follaje de árboles vivos o muertos que tengan menos de cuatro pulgadas de diámetro se quitarán hasta una altura de dos metros y medio.





IMPORTANT CUSTOMER NOTICE



**VEGETATION
MANAGEMENT**



Liberty™



Liberty™

Date: _____

Circuit ID: _____

Vegetation management is critical to the safety and reliability of electrical infrastructure. In order to comply with state law and safety best practices, any tree or vegetation that has grown too close to power lines will be pruned or removed to mitigate any wildfire or other safety risk.

Removing dead, diseased, or otherwise defective trees eliminates the potential that they could fall into or through power lines, creating not only a dangerous situation but also a fire hazard.

With your help, Liberty and its contractors are diligently reducing the risk of wildfire and increasing the reliability of your power service through responsible vegetation management.

Contact Name: _____

Message: _____



Liberty Utilities - Tahoe

Published by Sprout Social · March 7 at 8:55 AM ·



Tree crews will be at work in the following areas this month: North Lake crews will be in Tahoma, Tahoe City, and Tahoe Vista. South Lake crews will continue work in the Meyers area.



Infrastructure Hardening

Infrastructure hardening is an ongoing system infrastructure improvement and replacement process aimed at lowering the potential of fires sparked by electric infrastructure. These improvements will require several years to implement and will include some of the following projects:

Covered Conductors

Covered conductors are wires surrounded by layers of insulated coverings that protect from contact while energized. Although bare wires have traditionally been used in California as a reliable, cost-effective solution, Liberty will continue replacing bare conductors with covered conductors in high fire risk areas to reduce wildfire risk.

Pole Load Testing & Replacement

Liberty understands that failing poles pose safety, reliability and fire risks. To prevent pole failure, Liberty Utilities is accelerating and continuing the testing and replacement of poles systemwide.

Fuse Replacement

Conventional fuses, when operated, expel hot particles and gases, which can start fires. In contrast, current limiting fuses, traditionally used for protecting “equipment,” expel no materials and provide for a high level of reliability. In order to mitigate the risk of wildfire, Liberty proposes to replace conventional fuses with current limiting fuses on much of its system over the coming years.

Replacement of Brockway Substation

The Brockway Substation in Kings Beach is a 60-year-old facility that was constructed with wooden poles and cross arms and obsolete oil-circuit breakers. This facility has been decommissioned. The new Kings Beach substation has been completed and has replaced the Brockway Substation.

Undergrounding

Liberty continues to underground sections of the power grid and will do so for the next few years.



Wildfire Mitigation Plan

What You Need to Know

Liberty is taking precautionary steps to protect the community from wildfires by implementing a robust wildfire mitigation plan. The best way to stay informed about power shutoffs, vegetation management and system upgrades is to be sure your personal contact information Liberty has on file is up-to-date.

To update your contact information, customers can:



1-800-782-2506:



LibertyUtilities.com

Catastrophic wildfires have become all too common in California. To mitigate the risk of wildfires in the communities we serve, Liberty is taking aggressive steps to keep you and your family safe.

Liberty is acutely aware of the significant fire risk in the Lake Tahoe Basin and surrounding forested areas that make up its service territory. Drought and bark beetle infestation have devastated portions of our local forest, slowly suffocating the life out of the trees that dot our landscape. These dying trees now serve as ideal fuel for the wildfires that threaten our community's safety.

There are measures we can take to protect the local community from the threat of wildfire, which is why Liberty recently implemented a wildfire mitigation plan that was developed to address local factors that could put our region at risk.

Energy and water for life.

The spark of a wildfire can come from any number of sources. It is impossible to predict when or where a wildfire may start, but certain factors such as an evolving climate, dry forests and high wind conditions have most of the Golden State on high alert.

Here are a few steps Liberty is taking to protect you and your family:

Vegetation Management

Inspection

Liberty's crews are deployed year-round throughout the region to inspect trees and vegetation in the vicinity of power lines. In order to comply with state law and safety best practices, any trees or branches that have grown too close to power lines will be pruned or removed to mitigate any wildfire risk.

The majority of the tree and vegetation management work is executed from May through October, but work continues through the winter months and can include the daunting task of removing vegetation debris after snow storms.

Removal & Notification

When trees are identified for pruning, crews are instructed to reduce branches and vegetation back to a minimum distance from the high voltage power lines to provide adequate clearance. Crews will additionally identify any trees for removal that are dead, diseased or structurally unsound, despite being within the acceptable clearance zone, if they have the potential to fall on power lines.

When trees need to be removed, Liberty and its contractors will notify the property owner prior to starting work.

Customers should never attempt to conduct the tree pruning activities themselves, due to the risk of coming in contact with power lines during the process.

Liberty offers complimentary tree-pruning services to customers who believe a tree or branch may be hazardous to nearby electric infrastructure. If you spot a tree or branch you feel may be a hazard, submit a tree inspection request at LibertyUtilities.com or



Call: 530-546-1787
Email: CAtree@libertyutilities.com
Visit: www.libertyutilities.com/cavegetation/

Public Safety Power Shutoff

A Public Safety Power Shutoff (PSPS) is the process by which an electric utility may proactively turn off power in certain areas when and where weather conditions create a high wildfire risk. The implementation of a PSPS, which is becoming more and more frequent, is supported by the State of California as a safety best practice.

Weather & Environmental Conditions

Liberty has deployed weather stations throughout the local service area, and collaborates with fire weather experts, the National Weather Service, and local fire officials to monitor local weather conditions.

PUBLIC SAFETY POWER SHUTOFF CRITERIA

While no single factor will drive a Public Safety Power Shutoff, some factors include:

- ✓ RED FLAG WARNING
- ✓ LOW HUMIDITY
- ✓ DRY FUEL CONDITIONS
- ✓ FORECAST SUSTAINED WINDS & GUSTS
- ✓ HEAT/TEMPERATURE

Notification

In the event that a PSPS is a possibility, Liberty will alert customers, local government and safety agencies of the potential need to shut off power and keep the community apprised as weather conditions evolve. Customers are encouraged to follow the utility on Twitter (@LibertyUtil_CA) and Facebook (@LibertyUtilitiesLT) to receive timely updates on power outages, planned or unplanned.

In 2020, Liberty invested approximately

\$11.1 MILLION

in our vegetation management program, which includes routine vegetation management, wildfire mitigation initiatives, and CEMA



Vegetation Management

Vegetation Management is a critical, yet somewhat behind the scenes department of an electric utility. Unless tree work is being done in your neighborhood or backyard, it goes largely unnoticed. Inspecting, pruning, and removing trees, branches, and other vegetation to maintain power line clearance is essential to safe operations. Trees can also cause power outages when branches contact power lines, break and fall on lines, or when trees are blown over on to power lines during storms.

Liberty employs International Society of Arboriculture (ISA) Certified Arborists to manage our vegetation management program. ISA Certified Arborists must demonstrate a high level of knowledge and experience to gain certification, and are required to maintain certification through continuing education in the science and best practices of proper tree care. Our arborists love what they do and their high quality work contributes significantly to providing reliable electric service.

When trees are identified for trimming, crews are instructed to prune branches and vegetation back to a minimum of 12 feet from the high voltage power lines to maintain adequate clearance. Additionally, trees that are dead, diseased or structurally unsound, which have the potential to fall on power lines are identified and scheduled for removal.

Liberty's vegetation management efforts include:

- Systematic routine vegetation maintenance program where the entire system is inspected and treated on a three year cycle.
- Aggressively removing dead and dying trees wherever they pose an eminent threat to powerlines
- Embarking on a new partnership with the United States Forest Service to enhance forest health and protection through fuels reduction.

Liberty is coordinating with the California Tahoe Conservancy (CTC) to reduce and remove wood and fuels from parcels owned by the CTC in the Tahoe Basin. Liberty routinely conducts vegetation management work along power lines to remove identified hazards. Removal of dead trees or other hazards sometimes results in a significant amount of wood left on site. In cooperation with the CTC, Liberty's authorized contractors will cut logs from tree removals into firewood lengths and leave on site in an accessible location. These locations are reported back to the CTC to advertise to the public for free firewood collection. Firewood pickup locations and fuel wood permit application can be found at the button below:

[Firewood Permit ▶](#)

Customers should never attempt to trim trees in the vicinity of power lines, due to the danger and risk of coming in contact with power lines. If you are concerned about trees or vegetation in or near power lines please review the FAQs or complete the Tree Inspection Request form.

[Submit a Tree Inspection Request form ▶](#)

[Tree Safety and Vegetation Management FAQs ▶](#)

